FEB | 2 | 1999

Mr. Dan Wall
Project Manager
Superfund Division
U.S. EPA
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Mr. Wall:

## POST-CLEANUP EVALUATION FOR THE SOUTHEAST DRAINAGE

Remediation in the Southeast Drainage was completed in February 1998. The November, 1996 Engineering Evaluation/Cost Analysis (EE/CA) Decision Document approved for the project stated that achieving risk reduction in all segments of the drainage was the basis for cleanup. Samples were taken as specified in the Post Remediation Sampling Plan for the Southeast Drainage. Results were analyzed by Argonne National Lab and risk reduction was calculated (see attached). Results indicathat risk was reduced in all segments of the drainage, thereby fulfilling the goal of the EE/CA Decision Document.

Although overall post remediation sample results indicate cleanup goals were achieved two locations (#60 and #101) with anomalous results have been evaluated for an additional limited removal effort. A total of approximately 10 cubic yards of soil is targeted for removal from both areas. A small backhoe would likely be utilized to excavate each area and train the soil to a dump truck. It is expected that three truckloads of soil would be hauled out of the drainage area. Minimal impact to the drainage would result and it would be returned to its current condition. Use of the Katy Trail would be minimal. Following this limited removal effort, samples will be taken and analyzed to document the final concentrations at these locations. We intend to perform this work as soon as possible and expect that it will require less than one week in the field. Issues associated with Katy Trail access are being worked directly with MDNR-Parks.

Pending resolution of any issues, we expect to proceed expeditiously. If you have any questions, contact Tom Pauling at (314)441-8978.

Sincerely,

Stephen H. McCracken Project Manager Weldon Spring Site Remedial Action Project

Enclosure: As stated

cc w/enclosure: Larry Erickson, MDNR MDNR Field Office Mike Schroer, MDC

cc w/o enclosure: Gene Valett, PMC Mary Picel, ANL

PAI:YDeyo:x7034:emh:2/I1/99 (m:SED Post Cleanup Removal Evaluation)

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## ATTACHMENT: POST-CLEANUP RISK ASSESSMENT FOR THE SOUTHEAST DRAINAGE

This attachment presents the results of the post-cleanup risk assessment performed for the Southeast drainage. The purpose of the assessment was to determine the amount of risk reduction achieved by the removal action.

Risk calculations were performed using the same methodology as used in the EE/CA (DOE 1996). Risks were estimated for the current hunter and future child scenarios. The exposure routes evaluated include incidental ingestion of sediment and external irradiation. Risk reduction achieved at specific locations is presented in Table 1. Risk estimates for the child scenario for all locations targeted in the EE/CA are shown. Seventeen additional locations were also cleaned up in the lower portion of Segment C and upper portion of Segment D because these locations were determined to be accessible during the planning stages of the removal action. These additional locations are indicated with an asterisk (\*). Exposure point concentrations used to calculate potential post-cleanup risks were those obtained after removal was completed. Post-cleanup concentrations for each radionuclide at the various locations are shown in Table 1. At locations where more than one sample was taken, the data for each radionuclide were averaged.

Table 1. Location Specific Risk Estimates for the Child Scenario

	Exposure Point Concentration (pCi/g)				Cumulative Risk	
Location ID	Ra-226	Ra-228	Th-230	U-238	Baseline*	Post-Cleanup
00 L	12	1.7	4.7	38	9 x 10 <sup>-3</sup>	1 × 10 <sup>-5</sup>
005	4.7	2.9	23	11	2 x 10	7 x 10*
012	1.7	1.1	2.2	ND	4 x 10 <sup>-5</sup>	$2 \times 10^{-6}$
025	15	1.3	21	74	3 x 10 <sup>-1</sup>	3 x 10 <sup>-3</sup>
027*	23	6.6	15	27	2 x 10 <sup>-3</sup>	2 x 10 <sup>-5</sup>
028	111	ND	3.2	3.7	$3 \times 10^{-5}$	$1 \times 10^{-5}$
055	4.3	0.99	5.6	8.8	2 x 10 <sup>-3</sup>	5 x 10°
058	5	1.2	2.9	5.0	5 x 10 <sup>-5</sup>	5 x 10 <sup>-5</sup>
059	4.9	ND	46	10	5 x 10 <sup>-5</sup>	6 x 10°
060	120	17	2,500	79	5 x 10 <sup>-3</sup>	$2 \times 10^{-4}$
061	27	0.99	18	70	8 x 10 <sup>-3</sup>	3 x 10 <sup>-3</sup>
062	11.3	1.1	1.3	ND	1 x 10 <sup>-3</sup>	$2 \times 10^{-4}$
063	11	ND	3.2	6.1	5 x 10 <sup>-5</sup>	1 x 10°
064	2.9	1.3	4.7	10	2 x 10 <sup>-3</sup>	4 x 10 <sup>-4</sup>
065	12	2,6	29	30	6 x 10 <sup>-5</sup>	$2 \times 10^{-3}$
066*	10	1.5	70	16	5 x 10 <sup>-5</sup>	1 x 10 <sup>-5</sup>
067*	1.5	1.2	1.3	ND	3 x 10 <sup>-5</sup>	2 x 10 <sup>-6</sup>
068*	1.5	i 1.2	1 1.3	1 2.1	9 x 10 <sup>-3</sup>	2 x 10°
		1.8	16	18	1 x 10 <sup>-5</sup>	[ x 10 <sup>-3</sup> _
072	11		38	30	2 x 10 <sup>-3</sup>	9 x 10°
092	5.4	1.5	. 30	! <del>-</del>		

<u> </u>	Exposure Point Concentration (pCi/g)				Cumulative Risk	
Y	Ra-226	Ra-228	Th-230	U-238	Baseline*	Post-Cleanup
Location ID		1.2	0.76	76	2 x 10 <sup>-1</sup>	5 x 10°
093	1.9	1.2	8.9	17	1 x 10 <sup>-5</sup>	5 x 10°
094	3.8	1.1	3.7	2.5	3 x 10 <sup>-4</sup>	3 x 10 5
098	2.5	1.2	12.5	3.0	5 x 10 <sup>-3</sup>	3 x 10°
099	2.5	6.8	1,900	19	2 x 10 <sup>-4</sup>	1 x 10 d
101	89		11.6	ND	9 x 10 <sup>-3</sup>	2 x 10°
102.1	1.4	1.4	6.4	9.9	2 x 10°°	4 x 10 <sup>-3</sup>
102	2.8	1.3	1.5	ND	4 x 10 <sup>-5</sup>	2 x 10 <sup>-6</sup>
103	1.3	0.77		11	1 x 10	6 x 10*
104	4.1	1.1	9.4	29	3 x 10°5	1 × 10 <sup>-5</sup>
105	16	0.82	3.4	ND	6 x 10 <sup>-6</sup>	2 x 10°
106	1.3	1.3	1.3	40	4 x 10°3	3 x 10 <sup>-5</sup>
107*	34	1.8	45	9.6	$3 \times 10^{-3}$	7 x 10°
108.1	7.1	0.98	3.3	111	2 x 10°	5 x 10 <sup>-6</sup>
· 108*	5.3	1.1	4.7	24	3 x 10 <sup>-3</sup>	5 x 10 <sup>-6</sup>
110*	4.3	1,1	2.9	5.6	$1 \times 10^{-3}$	3 x 10°
110.1*	1.8	ND	2.1	1 29	4 x 10 <sup>-5</sup>	9 x 10-
111*	4.6	1.2	22	9.i	1 x 10	1 x 10°5
112*	11	ND	10	11	1 6 x 10 <sup>-5</sup>	3 x 10°
113*	36	0.96	11	<u> </u>	2 x 10 <sup>-5</sup>	3 x 10 <sup>-9</sup>
114*	2.7	1.0	2.0	$\frac{-10.1}{7.3}$	5 x 10 <sup>-3</sup>	5 x 10°
115*	4.5	0.93	7.3	5.3	$2 \times 10^{-5}$	3 x 10°
116*	2.2	1.4	1.8	10	9 x 10°	9 x 10 <sup>-4</sup>
117*	9.4	1.6	12	70	$\frac{7 \times 10^3}{2 \times 10^3}$	2 x 10 <sup>-6</sup>
118*	17	6.7	60	111	$2 \times 10^{-3}$	2 x 10 <sup>-6</sup>
119	1.5	0.99	0.69	ND	1 x 10 <sup>-2</sup>	
120	8.8	0.62	2.4	11	2 x 10 <sup>-3</sup>	1 x 10'
121	15	1.1	7.8	2.7	$\frac{2 \times 10^{3}}{3 \times 10^{3}}$	
122	1.7	1.4	1.1	3.8	5 x 10 <sup>-3</sup>	
123	5.0	1.1	7.1		1 x 10 <sup>-4</sup>	7 x 10°
124	6.7	1.6	12	9.4	1 x 10 <sup>-4</sup>	6 x 10°
132	65	ND_	120		5 x 10°	$2 \times 10^{\circ}$
141	2.1	0.92	4.9	2.9	$2 \times 10^{-3}$	
149	10	1.4	18		9 x 10	7 x 10
153	7.3	1.2	3.5	6.4	5 x 10	$\frac{7 \times 10^{-5}}{5 \times 10^{-5}}$
154	5.1	1.7	8.6	8.3	J <u>X10</u>	3 12 43

a Based on pre-removal data as presented in the EE/CA (DOE 1996).

Additional calculations were also performed to show risk reduction achieved for each segment. Exposure point concentrations for sediment were calculated for each exposure unit (i.e., segment) by using the one-tailed 95% upper confidence limit of the arithmetic average (UCL) or the maximum, whichever was lower (per EPA guidance). Post-cleanup data for each segment were aggregated with data from locations in each segment that were not targeted for cleanup. (Note that some locations that were not targeted for cleanup because they are not accessible have contaminant concentrations that exceed risk-based cleanup criteria). At locations where more than one sample was

collected, the data were averaged to obtain a representative concentrations for that location prior to aggregating the data for each segment. A summary of the data used in the risk calculations is presented in Table 2.

Table 2: Summary of Residual Contamination in the Southeast Drainage

Radionuclide Concentration (pCi/g) Segment C Segment D Segment B Segment A Radionuclide UCLRange UCL Range UCL Range UCL Range 1.1-120 19 1.1-36 12 40 23 1.2-110 1.3-39 Radium-226 7.4 0.62 - 852.7 0.77 - 6.62.0 0.74-6.8 2.3 Radium-228 0.64 - 5.00.69-2,500 180 1.3-45 12 0.27-1,900 370 18 0.20 - 38Thorium-230 34 22 2.0 - 2001.3 - 74-30 2.5-59 Uranium-238 | 11-200 77

Results of the post-cleanup risk calculations for each segment are presented in Table 3. For comparison purposes, baseline risk calculations are also shown. Significant risk reduction (i.e., 40% or higher) was achieved for each segment with the highest amount of reduction observed in Segment C (i.e., 90%). The added risk reduction achieved in Segment C from removal of 14 additional locations not originally targeted in the EE/CA reduced the residual risk from 4 x 10<sup>-3</sup> to 1 x 10<sup>-5</sup>. Additional removal of three locations in Segment D did not result in further risk reduction in this segment.

Table 3: Estimated Risk Reduction from Exposure to Sediment

1	н	unter	Child		
Segment A B C D	Baseline 1 x 10 <sup>-5</sup> 2 x 10 <sup>-5</sup> 2 x 10 <sup>-5</sup> 1 x 10 <sup>-5</sup>	Post-Cleanup  5 x 10 <sup>-6</sup> 1 x 10 <sup>-3</sup> 3 x 10 <sup>-6</sup> 5 x 10 <sup>-6</sup>	Baseline 5 x 10 <sup>-5</sup> 1 x 10 <sup>-5</sup> 9 x 10 <sup>-5</sup> 5 x 10 <sup>-5</sup>	Post-Cleanup $2 \times 10^{-5}$ $5 \times 10^{-5}$ $1 \times 10^{-5}$ $3 \times 10^{-5}$	